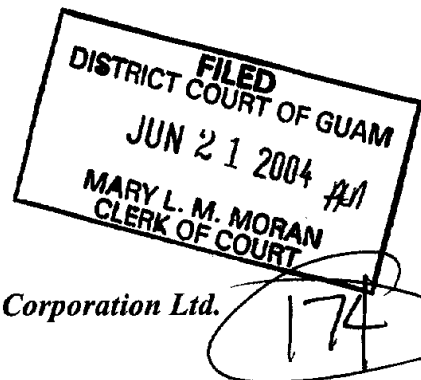


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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**DECLARATION OF JACQUES G.
BRONZE IN SUPPORT OF HSBC's
OBJECTIONS TO PLAINTIFFS'
FEES AND EXPENSES**

I, JACQUES G. BRONZE, hereby declare and state as follows:

1. All matters herein are based on my own personal knowledge.
2. I am over 18 years of age, and legally competent to testify to the facts below and I do so based upon my own personal knowledge.
3. I am the counsel of record for Hongkong and Shanghai Banking Corporation, Ltd., ("HSBC"), in the above-entitled matter.

4. The PMC documents were provided to Plaintiffs on or about early March, 2004, and were already reviewed extensively and used by Plaintiffs' counsel as exhibits in the depositions of Joseph K. Fang and Stephen Grantham taken on May 7 and May 10, 2004, respectively.

5. Similarly, the emails reviewed in reference to the Underwood deposition were provided to Plaintiffs on or about February 23, 2004, and were extensively used as Plaintiffs' exhibits in the deposition of Joseph K. Fang.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED this 19th day of June 2004.



JACQUES G. BRONZE